ENVIRONMENTAL TECHNICAL SERVICES
AN ENVIRONMENTAL CONSULTING FIRM

(800) 200-4ETS

2005 - 2006 ANNUAL REPORT DOCUMENTING THE IMPLEMENTATION OF THE OPERATIONS AND MAINTENANCE PLAN

FORMER HECKATHORN NPL SITE

Located At The

LEVIN-RICHMOND TERMINAL CORPORATION
402 WRIGHT AVENUE
RICHMOND, CALIFORNIA

June 2006

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Gary M. Levin
Levin Richmond Terminal

7/10/2006
Date

Helen Mawhinney
Environmental Technical Services

Date

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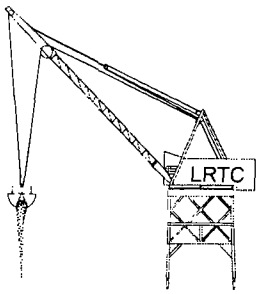

Levin-Richmond Terminal Corporation

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Direct Tel: (510) 307-4091 / Fax: (510) 236-0129
E-mail: garyl@levinterminal.com

July 10, 2006

Carmen White
EPA Project Manager, Superfund Program
U.S. EPA
75 Hawthorne Street
San Francisco, CA 94105

Re: **2005-2006 Annual Report Documenting the Implementation of the O & M Plan**
Former Heckathorn NPL Site – EPA ID# CAD981436363
EPA Region 9 – Contra Costa County

Dear Ms. White

Enclosed find documentation of the implementation of the OMP for the referenced site. This OMP Report is for the period ending June 2006.

Please contact me if you have any questions.

Very Truly Yours,

Gary Levin

Gary M. Levin, CEO

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1.0 INTRODUCTION

This document is prepared for submittal to the United States Environmental Protection Agency (U.S. EPA), Hazardous Waste Management Division. Levin-Richmond Terminal Corporation (LRTC), in compliance with the State of California General Stormwater Permit for Discharges of Stormwater Associated with Industrial Activities (General Permit), has performed activities that are included in its Stormwater Monitoring Plan (SWMP). The SWMP also provides the basis for the evaluation of compliance with the General Permit and Stormwater Pollution Prevention Plan (SWPPP). The combination of the SWMP and the SWPPP comprise the stormwater monitoring and pollution prevention plans for the entire 42-acre site and facilities owned and operated by LRTC.

As required by the U.S. EPA Consent Decree, dated April 22, 1996 and the completed Upland Cap Installation at the former United Heckathorn Facility, Richmond, California, the Operations and Maintenance Plan (O&M Plan) describes the procedures for the long-term management of the upland capping system at the 4.5-acre Heckathorn NPL Site. The results of inspections, monitoring, and maintenance of the cap and drainage system are documented within this Annual Report. The upland remedy implemented by LRTC and Levin Enterprises Inc. was approved on September 30, 1999. In order that the Annual Report of the O&M Plan may coincide with the Annual Report requirements of the SWMP and the SWPPP, LRTC submits both Annual Reports by July 1 of each year. All referenced reports and documents are available at LRTC and will be sent to the U.S. EPA upon request.

This document presents the June 2006 summary of recent inspections and maintenance by LRTC of the cap and associated stormwater interceptors. Submittal of Annual Reports will be made for the reporting period ending June 30 of each year.

1.1 Background

Environmental Technical Services (ETS) prepared and caused to be filed on behalf of LRTC the 2005-2006 Annual Report for Stormwater Discharges Associated with Industrial Activities, for the period ending June 2006. During the 2005 – 2006 reporting period no changes have been made to the Heckathorn NPL Site, including but not limited to material processes, capping, interceptors, and site construction. Site observations, monitoring, and "Good Housekeeping Practices" are performed on a daily basis.

1.2 Current Site Use

The Levin-Richmond Terminal Corporation operates a dry-bulk marine terminal encompassing approximately 42 acres. Total activities include uncovered storage of cargo materials such as metallurgical coke, petroleum coke, sand, bauxite, iron ore, granulated blast furnace slag and manganese. The bulk cargo is stockpiled onsite and loaded onto vessels or unloaded from vessels to rail cars and trucks. The capped section of the former Heckathorn Site is used for stockpiling cargo and railroad operations.

2.0 CAP AND STORMWATER INTERCEPTORS

2.1 Description of Capping System

Concrete Cap

The cap is located in the upland area location of the former United Heckathorn Facility. The cap consists of a minimum of six inches of concrete aggregates with reinforcing steel wire. The reinforcing steel consists of a double layer of 6' by 6' W4.5 X W4.5 steel-welded wire fabric (WWF). In some areas the cap overlies asphalt. In the other areas where asphalt does not exist, the cap overlies a double layer of 4-inch by 4-inch W4.5 X W4.5 WWF. In these areas the sub-grade was prepared and compacted according to the specification approved by the U.S. EPA.

Geotextile Fabric and Gravel Cover

Some areas of the upland cap adjacent to railroad tracks and switches, where the storage and handling of bulk materials does not occur, were covered with a geotextile fabric and gravel. These areas consist of soils potentially containing pesticides. The geotextile membrane and six-inches of clean imported gravel cover these soils.

2.2 Inspection of Cap

The cap was inspected by John Peterson for Buster Building, General Contractor, License No. 513203 C8 (concrete), on May 31, 2006, and found to be intact and in good condition. The cap is also inspected quarterly by Environmental Technical Services (ETS) while performing stormwater and "Good Housekeeping" observations. The cap was found to be uncompromised with only occasional surface "feather" cracks typical of those which develop subsequent to the curing of freshly poured concrete. The cracks are insignificant and not indicative of stress fractures. These surface cracks are too small to repair. Refer to Attachment B for the Buster Building, General Contractor, Report of Cap Inspection, May 31, 2006.

2.3 Inspection of Drop Inlets and Interceptors

Visual observations of stormwater runoff and stormwater systems are performed on an as-needed basis during shipping activities, periods of significant rainfall, dry and wet seasons. Work areas and surface conditions are inspected on a daily basis and the entire site is cleaned using LRTC's power vacuums and sweeper power brooms as part of LRTC's routine housekeeping. Site surfaces are kept clean to assist in ensuring that sediment and contaminants do not enter nearby surface waters.

LRTC staff and Environmental Technical Services (ETS) perform regular site observations. ETS has been retained to perform random site inspections and to advise LRTC as to effective pollution prevention improvements. Mr. Lou Butty of American Textiles, a pollution absorbent/prevention materials expert and vendor, performs site inspections during the wet season to evaluate the condition and placement of absorbent snakes, socks, pads, and fabrics.

LRTC's Stormwater Pollution Prevention Plan includes the inspection and documentation of drop inlet and interceptor conditions each quarter, dry season, and annually. Monthly inspections are required during the wet season. LRTC and ETS have elected to document all inspection results on a monthly basis. The results are included in the Annual Report for Stormwater Discharges Associated with Industrial Activities.

2.4 Purging and Cleaning of the Storm Drains

Plans for the annual cleaning of five stormwater interceptors were developed by Levin Richmond Terminal personnel with Environmental Technical Services in June 2003. Cleaning was increased to several times throughout the year beginning in June 2005 and remains an active part of LRTC's SWPPP. The interceptors are emptied on an as-needed basis to eliminate stormwater discharge.

Composite water samples were collected from interceptors SW-3 through SW-7 on July 14, 2005, November 29, 2005, March 8, 2006, and May 23, 2006.

The July 14, 2005 composite sample was designated as No. SW-1 through SW-7, SW-10, Equip. Wash-water. The samples taken on November 29, 2005, March 8, 2006, and May 23, 2006 were designated as No. LRTO SW-3 through SW-7.

Composite sampling was accomplished by lowering a clean sample bottle into standing water within the last chamber. The bottle was allowed to fill with stormwater which was then decanted into appropriately preserved sample bottles. Three discrete, 40-ml,

Volatile Organics Analysis bottles were filled from each interceptor to be composited by a State certified analytical laboratory as one sample for analysis. Stormwater samples for all other analyses were composited during field sampling. This was accomplished by collecting equal amounts of water from each interceptor within a clean 5 gallon Teflon container. Upon completion this water was then decanted into sample bottles.

Each sample bottle was labeled with LRTO as the project name, stormwater system identification number, sampler's name, date, time, and preservative. The samples were placed within a cooler on ice, and transported within the sample's holding time to a certified analytical laboratory under chain of custody.

2.5 Analyses

All composite stormwater samples were analyzed for oil and grease (O&G, using EPA Method E1664A); benzene, toluene, ethylbenzene, total xylenes, (BTEX, using EPA Method Modified 8260B); Specific Conductance (SC, using EPA Method 120.1); pH (using HYDAC pH meter); copper, lead, nickel, and zinc (Cu, Pb, Ni, Zn, using EPA Method 200.7); and total organic carbon (TOC, using EPA Method E415.1).

Composite stormwater samples collected on July 14, 2005 were analyzed for total suspended solids (TSS, using EPA Method 160.2); total petroleum hydrocarbons as diesel (TPH-d, using EPA Method 8015M); total petroleum hydrocarbons as gasoline (TPH-g, using EPA Method 8015M); methyl tert-butyl ether (MtBE, using EPA Method Modified 8260B); total petroleum hydrocarbons as oil (TPH-oil, using EPA Method 8015M); aluminum (using EPA Method 200.7); and pesticides (using EPA Method SW8081A).

The stormwater composite sample collected on July 14, 2005 was not analyzed for total organic carbon as it was not requested by the City of Richmond's, Waste Water Division. This sample was also not analyzed for total suspended solids due to a laboratory login error referenced within the attached Torrent Laboratory analytical report.

Certified clean, properly preserved bottles were supplied by a state certified analytical laboratory. The bottles were stored in sealed plastic bags and placed within tightly sealed containers to prevent contamination. Tony Lester of LRTC collected the stormwater samples under the supervision of ETS. Mr. Lester was trained in proper sample collection, storage, and maintenance of clean sample containers and equipment. A clean glass sampling device was used for each stormwater drain. Disposable latex gloves were changed when an unclean surface was encountered and between samples. Headspace was eliminated in sample bottles and appropriate preservatives used.

Upon completion laboratory analytical results were presented to the City of Richmond's Waste Water Division, Pretreatment Program, for review to determine if water removed during the stormwater interceptor's cleaning process could be discharged into the sanitary sewer. Following approval of analytical results, the City of Richmond inspected the storm drains and sanitary sewer and discharge was approved under LRTC's Industrial Discharge Permit. The Waste Water Division was notified 48-hours prior to each project start.

LRTC's OSHA certified personnel emptied and cleaned interceptors SW-3 through SW-7 under a site-specific Health and Safety Plan. LRTC pumped water from the interceptors utilizing a specially equipped water truck. Water was discharged from the water truck directly into the sanitary sewer. Sediment was removed from the interceptors using stormwater to liquefy the sediment, which was then pumped into the vacuum truck. Sediment was released from the truck onto 6-ml plastic and covered with 6-ml plastic bermed with K-Rail. Sediment was stored away from the drop inlets to be disposed of at a qualified landfill.

Subsequent to emptying, each interceptor's floor and sidewalls was pressure-washed. This process was repeated until all sediment had been removed and the cleaning of each interceptor complete.

3.0 SAMPLING OF STORMWATER INTERCEPTORS SUBSEQUENT TO RAINFALL

Rainfall did not occur through June 30, 2006 in quantities sufficient to create an outpour of stormwater from interceptors SW-3 through SW-7. LRTC personnel were able to empty all stormwater and sediment from each interceptor prior to fall rainfall allowing LRTC to enter the rainy season with dry interceptors. The practice of emptying interceptors SW-3 through SW-7 several times throughout the rainy season allowed LRTC personnel to prevent stormwater discharge into the Lauritzen Channel and is scheduled to be repeated each year subsequent to, and during, seasonal rainfall.

4.0 BETTER BUSINESS PRACTICES / GOOD HOUSE KEEPING

Levin-Richmond Terminal Corporation has been working closely with Environmental Technical Services improving and upgrading each site process that could adversely impact the environment. Improvements are not limited to but include the following:

4.1 Street Sweeper

In 2001 LRTC purchased a Tennant vacuum power sweeper which is scheduled to

perform daily sweeping of outside surface areas and cleanup following the loading of ships. The sweeper is also positioned and manned during appropriate cargo operations.

A second vacuum power sweeper, manufactured by Sentinel, was purchased by LRTC and working onsite by January 1, 2004. The sweeper is covered by a maintenance contract and is fully maintained by Tennant's service technicians

4.2 Water Truck

An LRTC water truck has been converted to pump and contain water from interceptors SW-3 through SW-7 prior to permitted discharge into the sanitary sewer. This prevents the stormwater within interceptors SW-3 through SW-7 from reaching levels that outflow into the Lauritzen Channel.

4.3 Vacuum Truck

An LRTC vacuum truck has been converted to pump and contain sediments from drain inlets and interceptors.

4.4 Brooms

LRTC operates two (2) IT-28 tractors with broom attachments to perform clean up of the capped surface following cargo operations.

4.5 Hay Bales

Hay bales are placed around the entirety of each interceptor and storm drain. During cargo handling operations stormdrain inflows within the work area are covered with Extech (a hydrocarbon, metal, sediment resistant fabric), and hay bales. Interceptor SW-3, located near the hopper building, is covered with plastic when the hopper is in use, to prevent the dropping of material from the hopper onto the interceptor. The steel plate covering interceptor SW-7 has a tight seal. Therefore, it is doubtful material would enter the basin. However, covering the interceptor is an added precaution.

A daily inspection is conducted by supervisors of all working stockpiles, mobile equipment, and conveying equipment for containment and cleanliness to eliminate the buildup of material on jackwalls, equipment, roadways, and surfaces. Small spills are given the same attention as large spills.

Cargo stockpiles are stored away from surface waters, drains, and stormwater inlets. L-Rail is placed around stockpiles for containment.

4.6 Absorbent Materials

Mr. Lou Butty, of American Textile, was retained to direct the placement of appropriate absorbent snakes, socks, pillows, and filters, around and within each interceptor and storm drain. The absorbent materials are photosensitive and have a limited life span. Each absorbent type is closely monitored and on a replacement schedule. The absorbent materials are white, allowing easy detection of saturation with waste.

Clean up stations have been placed strategically throughout the site in close proximity to areas where potential contaminants are used or stored and within each work vehicle. These materials are stored in foil factory-sealed bags to maintain their integrity. Ample supplies of absorbents are stored at LRTC.

A Dock Emergency Response Station has been established to efficiently organize access to adequate cleanup supplies.

Exposed soil and ties beneath railroad car "parking stations" have been covered with "Trackmat", an absorbent fabric barrier, prescribed and provided by American Textiles. This material is scheduled for routine replacement.

Mr. Butty inspects LRTC's absorbent supply and placement at the beginning of each wet season and then instructs LRTC's personnel as to effective changes in material, quantity, or placement, which could increase filtration efficiency.

Throughout the wet season hay bales and absorbents surround each drain inlet. Drain Guards have been placed within all drain inlets located on the former Heckathorn facility parcel. Each inlet is sealed with plastic and/or Extech fabric.

Stormwater runoff must flow through fabrics and absorbents prior to entering the stormwater interceptor or drain outflow. Additional hay bales, sediment pillows, and absorbent materials were added during the wet season's loading and unloading activities.

During the dry season interceptors were sealed by pressing hay bales, absorbents, and Extech fabric tight against each system's inflow. Inflow grates flush with grade are sealed with plastic sheeting. Where traffic allows each grate is covered with, and surrounded by, hay bales.

4.7 Interceptor Improvements

SW-1

All basins and the primary interceptor associated with stormwater system SW-1 were emptied and cleaned during the 2005 - 2006 reporting year to assist in decreasing contaminants.

In 2004, the stormwater collection trench, which flows to monitoring point SW-1, was upgraded by sealing the trench surface with asphaltic concrete. The trench was excavated at seven locations and sump basins constructed to allow the settling of sediments onto the basin floor. Surface cleanout grates were installed at grade. The storm drain interceptor system was thoroughly cleaned and upgraded with four new baffles, five compartments, and covered with steel plates.

Extech fabric was placed within each drain inlet. To decrease the entry of the three largest inlets and allow complete fabric coverage steel inserts were constructed and placed within the drain entry.

New hay bales were continually placed along the perimeter of each drain inlet. Additional absorbents were placed within the last interceptor compartment.

An Ultraguard Sock was placed over the interceptor's inflow and outflow pipes to decrease suspended solids.

Wright Avenue was bermed at a low point and the curbing at the property line was improved. Additional berming was added to all equipment and storage areas.

To prevent dust and debris from entering storm drains during the dry season, all associated openings are sealed using plastic, hay bales, and/or Extech fabric. Stormwater pollution prevention materials remain in place should off-season rainfall occur.

SW-2

Interceptor SW-2 was upgraded to an above ground interceptor in 2001 and constructed with three-tiered baffled chambers to allow the settling of sediments into the chamber floor.

In 2002 a concrete berm with a small opening was constructed around the interceptor's perimeter. Hay bales and absorbents surround this opening, creating a filtration system. Stormwater runoff must flow through the opening prior to entering a second filtration system surrounding the interceptor's inflow.

Additional hay bales, sediment pillows, and absorbents are added to this area during loading and unloading activities in the wet season to collect sediment prior to entering the interceptor.

Also, a Ultraguard Sock is placed on the cane pipe, which transports water from the second to the third and final chamber to collect suspended solids and decrease contaminants before stormwater discharges into the bay.

All basins and the primary interceptor associated with stormwater system SW-2 were emptied and cleaned during the 2005 - 2006 reporting year. Absorbents are replaced within each system's inlet(s). Inlets are also covered with plastic sheeting and/or hay bales during site operations.

All associated openings are sealed using plastic, hay bales, and/or Extech fabric during the dry season to keep interceptors clean. Pollution prevention materials remain in place throughout the year.

A steel, quick release door was constructed at the SW-2 drain entry allowing immediate closure and sealing the interceptor in the event of a non-stormwater release.

SW-3 through SW-7

These stormwater systems did not have outflow during the two rainfall sampling events and therefore were not sampled for annual stormwater reporting. However, composite water samples were collected from interceptors SW-3 through SW-7 for the purpose of emptying and cleaning each interceptor. Laboratory analytical results were presented to the City of Richmond Waste Water Division, Pretreatment Program, and the interceptor's collected stormwater was emptied into the City sanitary sewer under LRTC's City Industrial Discharge Permit.

All basins and the primary interceptors associated with stormwater systems SW-3 through SW-7 were emptied and cleaned multiple times during the 2005 - 2006 reporting year. These interceptors are scheduled to be emptied and cleaned several times throughout the year as part of LRTC's SWPPP. The interceptors are emptied on an-as-needed-basis to eliminate stormwater discharge.

Absorbents are routinely replaced within each system's inlet(s). Inlets are also covered with plastic sheeting; Extech fabric; and/or hay bales during site operations.

All associated openings are sealed using plastic, hay bales, and/or Extech fabric during

the dry season to keep the interceptors clean. Pollution prevention materials remain in place throughout the year.

SW-8, SW-9

As part of LRTC's Best Management Practices SW-8 drain inlet was rebuilt and it's outflow pipe replaced. The outflow pipe for SW-9 was replaced.

Additional absorbents have been placed around and within these interceptors.

An Ultraguard Sock was placed on the drain's outlet to collect suspended solids and decrease contaminants before stormwater discharges into the Parr Canal. The sock is removed, emptied, and replaced as needed.

Each storm drain entry is sealed during the dry season to prevent dust and debris from entering. The drains are sealed using plastic, hay bales, and/or Extech fabric. Stormwater pollution prevention materials are in place at all times.

SW-10

In 2001 this drop inlet was upgraded to an interceptor and constructed with two baffles and three chambers to allow the settling of sediments into the chamber floor. Additional hay bales and absorbents have been placed around and within the interceptor and are replaced regularly.

This interceptor was emptied and cleaned during the 2005 - 2006 stormwater reporting year.

An Ultraguard Sock was placed on the interceptor's outflow where suspended solids are captured prior to discharge into the Parr Canal.

All associated drain openings are sealed during the Dry Season using hay bales, Extech fabric, and/or plastic. Absorbent materials remain in place.

4.8 Training

LRTC's personnel working with potential contaminants are OSHA 40-hour Hazmat trained, with a yearly eight-hour refresher course. Qualified personnel are also spill-response trained.

On September 22 through 24, 2004, Bluewater & Associates conducted Hazardous Materials, Spill Emergency Response, Health and Safety, training at LRTC. Twenty-five LRTC employees completed certification. LRTC will continue annual training and certification. Annual training and certification are an integral component of LRTC's best management plan.

Training included but was not limited to the following:

OSHA Hazardous Materials Standard
Recognizing hazardous materials
Hazardous materials basics, terms, and definitions
Hazardous communications (HMIS, NFPA, MSDS's, DOT and ERG)
Decontamination
Toxicology, PPE,
Confined space entry
Department of Transportation exercises
Spill control, containment, and cleanup
Emergency procedures, and ICS

Environmental Technical Services (ETS) contracted a stormwater pollution prevention course for all of LRTC's supervisors in January 2005. The course included: regulations, Best Business Management Practices, surface water sensitivity, spill prevention, spill response, good housekeeping, pollution prevention, sampling and analyses, benchmarks, and reporting.

LRTC's stormwater pollution prevention supervisor Tony Lester, attended additional Blue Water and Associates, Inc. training, including the Qualified Individual Workshop, June 25 and 26, 2003: and the 2005 West Coast Spill Response School, April 19 through 21, 2005. In 2006, Tony continued stormwater pollution prevention. stormwater sampling, and spill response training with Environmental Technical Services.

2005 West Coast Spill Response School Training included but was not limited to the following:

Site safety
Initial response and assessment actions
Maritime security concerns
Oil spill simulations
Boom design and strategy
Skimmer design and strategy

Alternate response options
Oiled wildlife cautions
Shoreline clean-up assessments (SCAT)
Decontamination
Spill impacts and cost concerns
Survey of response equipment staging area
Initial response strategies
Site protection strategy deployment

4.9 Marine Spill Emergency Response

LRTC maintains a verbal contract with Zaccor Companies Inc., an emergency response contractor, to respond to an LRTC marine spill, should one occur. Zaccor Companies provides 24-hour emergency response on both land and water.

This contract includes providing emergency response vessels, personnel, absorbent consumables and Coast Guard approved oil containment booms.

The Coast Guard Marine Safety Office (MSO) requires that each visiting cargo vessel must have an existing OSRO with an emergency response contract prior to the Coast Guard allowing entry into US Ports.

4.10 Inspections

Daily inspections are conducted by supervisors and employees of all working stockpiles, mobile equipment, and conveying equipment, for containment and cleanliness to eliminate the buildup of material on jackwalls, equipment, roadways, and surfaces. Small spills are given the same attention as large spills.

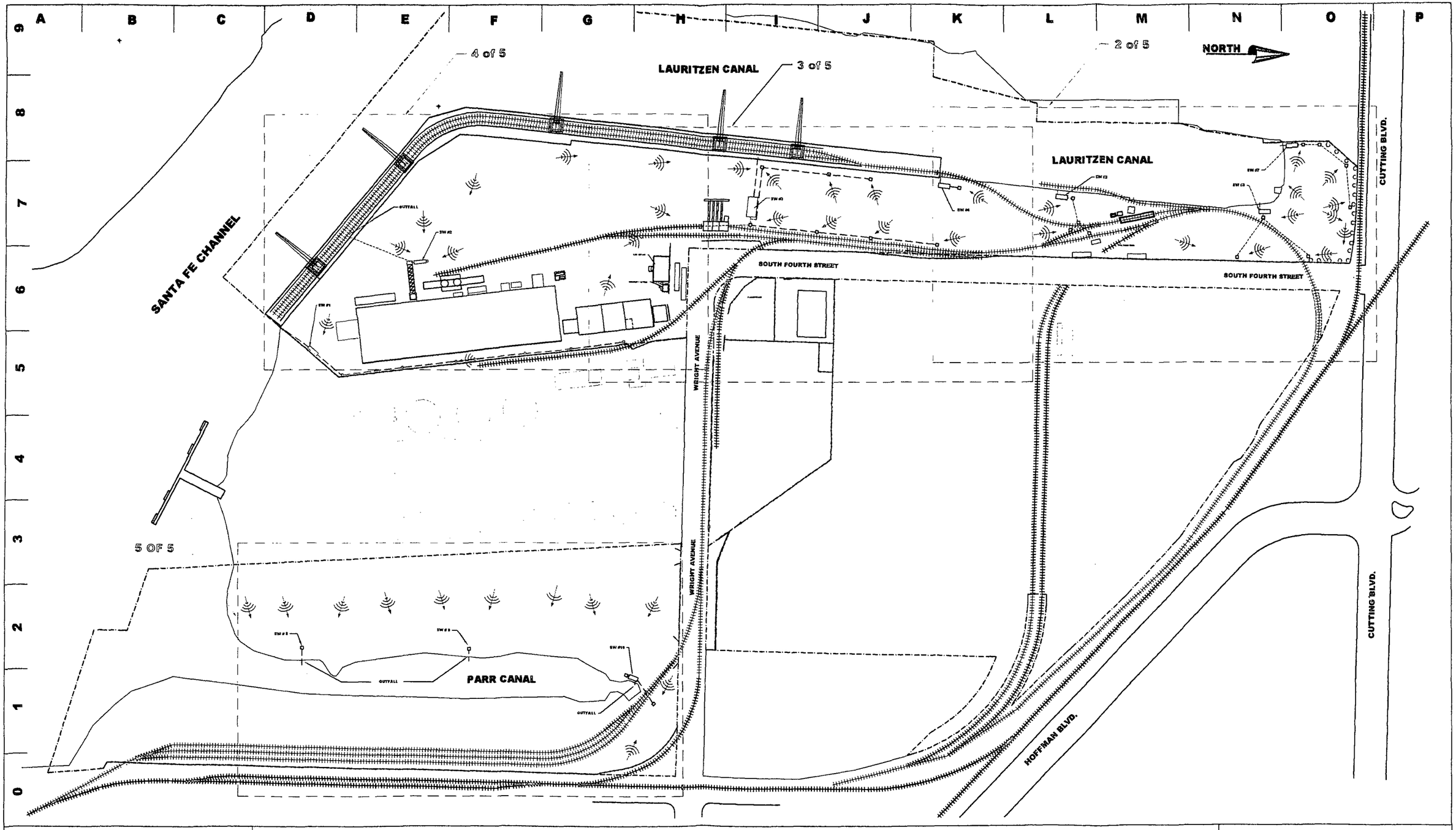
LRTC staff and/or Environmental Technical Services (ETS) perform site observations. ETS has been retained to perform site inspections randomly and to advise LRTC as to effective pollution prevention improvements. Mr. Lou Butty, of American Textiles, a pollution absorbent/prevention materials expert and vendor, performs site inspections during the wet season to evaluate the condition and placement of absorbent snakes, socks, pads, and fabrics.

5.0 SUMMARY

The finding and results submitted in this document satisfy the requirements of the Operations and Maintenance Plan, as stipulated by the U.S. EPA Consent Decree for the completed Upland Cap Installation for the Former United Heckathorn Facility, Richmond, California.

Appendix A

Plates



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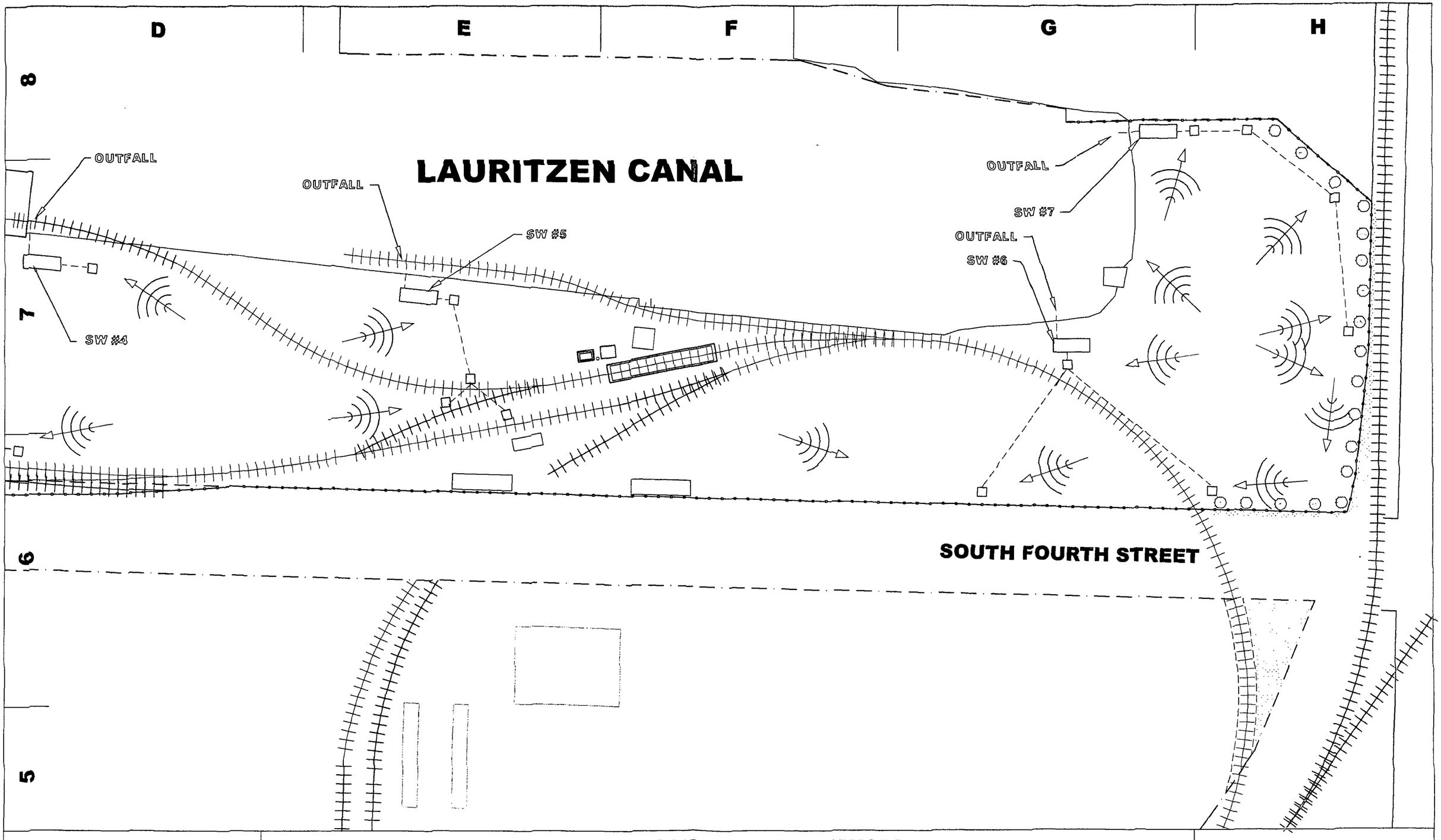

SCALE 1" = 60'

LEVIN-RICHMOND TERMINAL

STORM WATER FLOW, CATCH BASINS AND INTERSEPTORS

2 OF 5

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8

7

6

5

OUTFALL

OUTFALL

SW #3

SW #4

LRT OFFICE

SECURITY OFFICE

SOUTH FOURTH STREET

PARKING LOT

WRIGHT AVENUE

SCALE 1" = 60'

LEVIN-RICHMOND TERMINAL

STORM WATER FLOW, CATCH BASINS AND INTERSEPTORS

3 OF 5

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8 7 6 5

OUTFALL

SW #2

OUTFALL

SW #1

LRT OFFICE

SECURITY OFFICE

WRIGHT AVENUE

SCALE 1" = 60'

LEVIN-RICHMOND TERMINAL

STORM WATER FLOW, CATCH BASINS AND INTERSEPTORS

4 OF 5

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SW # 8

SW # 9

SW #10

OUTFALL

OUTFALL

PARR CANAL

SCALE 1" = 60'

LEVIN-RICHMOND TERMINAL

STORM WATER FLOW, CATCH BASINS AND INTERSEPTORS

5 OF 5

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Appendix B - Tables

TABLE Ia
Composite Water Sample
Stormwater Interceptors SW-1 through SW-7, SW-10, Equip Washwater
July 14, 2005

Constituent	SW-1 through SW-7, SW-10, Equip Washwater	Detection Limit	Unit	EPA Method
TPH-D	0.383x	0.1	ppm	8015M
TPH-G	0.0845	0.05	ppm	8015B
Benzene	ND	1.0	ppb	8260B
Toluene	ND	1.0	ppb	8260B
Ethyl benzene	ND	1.0	ppb	8260B
Xylenes	3.4	1.0	ppb	8260B
MTBE	ND	3.0	ppb	8260B
Oil & Grease	ND	5.0	ppm	E1664A
TPH-Oil	1.03	0.4	ppm	8015B
Specific Conductance	1,700.0	2.0	umhos/cm	E.120.1
PH	7.4	NA	PH Units	Hydac Meter
Aluminum	0.054	0.01	ppm	E200.7
Copper	ND	0.01	ppm	E200.7
Iron	ND	0.01	ppm	E200.7
Lead	ND	0.015	ppm	E200.7
Zinc	ND	0.01	ppm	E200.7
Pesticides	0.15	varies	ppb	SW8081A

ND = Not Detected for this constituent
x = No diesel present, Reported value is the result of carry over from the TPH as motor oil quantitation range

TABLE Ib
Composite Water Sample
Stormwater Interceptors SW-3 through SW-7
November 29, 2005

Date of Sample: November 29, 2005 **Person Collecting Sample:** Helen Mawhinney

Title: Environmental Technical Services

Analytical Laboratory: Torrent Labs, Inc Signature: _____

Constituent	LRTO SW-3 through SW7	Detection Limit	Unit	EPA Method
Specific Conductance	290	2.0	Umhos/cm	E120.1
TSS	6.0	2.0	ppm	E160.2
Benzene	ND	1.0	ppb	8260B
Toluene	ND	1.0	ppb	8260B
Ethylbenzene	ND	1.0	ppb	8260B
Xylenes	ND	1.0	ppb	8260B
Oil and Grease	ND	5.0	ppb	E1664A
Copper	0.037	0.01	ppb	E200.7
Lead	ND	0.015	ppm	E200.7
Nickel	ND	0.005	ppm	E200.7
Zinc	.063	0.005	ppm	E200.7
pH	7.4	6.0-9.0	STU	Hydac
Total Organic Carbon	5.5	0.50	ppm	E415.1

TSS = Total Suspended Solids

ND = Not Detected for this constituent

TABLE Ic
Composite Water Sample
Stormwater Interceptors SW-3 through SW-7
March 8, 2006

Date of Sample March 8, 2006 **Person Collecting Sample:** Tony Lester

Title:

Analytical Laboratory: Torrent Labs, Inc Signature: _____

Constituent	LRTO SW-3 through SW7	Detection Limit	Unit	EPA Method
Specific Conductance	250	2.0	Umhos/cm	E120.1
TSS	30	2.0	ppm	E160.2
Benzene	ND	1.0	ppb	SW8260B
Toluene	ND	1.0	ppb	SW8260B
Ethylbenzene	ND	1.0	ppb	SW8260B
Xylenes	ND	2.0	ppb	SW8260B
Oil and Grease	ND	5.0	ppm	E1664A
Copper	ND	0.010	ppm	E200.7
Lead	ND	0.015	ppm	E200.7
Nickel	ND	0.010	ppm	E200.7
Zinc	.ND	0.010	ppm	E200.7
pH	7.3	6.0-9.0	STU	Hydac
Total Organic Carbon	2.6	0.5	ppm	E415.1

TSS = Total Suspended Solids

ND = Not Detected for this constituent

TABLE Id
Composite Water Sample
Stormwater Interceptors SW-3 through SW-7
May 23, 2006

Date of Sample: May 23, 2006 **Person Collecting Sample:** Tony Lester

Title:

Analytical Laboratory: Signature: _____

Entech Analytical Labs, Inc.

Constituent	LRTO SW-3 through SW7	Detection Limit	Unit	EPA Method
Specific Conductance	1500	1.0	Umhos/cm	E120.1
TSS	ND	5.0	ppm	E160.2
Benzene	ND	0.5	ppb	5030C/ SW8021B
Toluene	ND	0.5	ppb	5030C/ SW8021B
Ethylbenzene	ND	0.5	ppb	5030C/ SW8021B
Xylenes	ND	1.0	ppb	5030C/ SW8021B
Oil and Grease	ND	0.5	ppb	E1664A
Copper	ND	0.005	ppm	E200.7
Lead	ND	0.005	ppm	E200.7
Nickel	ND	0.005	ppm	E200.7
Zinc	.ND	0.005	ppm	E200.7
pH	7.2	6.0-9.0	STU	Hydac
Total Organic Carbon	2.6	.05	ppm	E415.1

TSS = Total Suspended Solids, ND = Not Detected for this constituent